

EXHIBIT A-2

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of all
others similarly situated,
Plaintiff,

v.

Deutsche Bank Aktiengesellschaft, et. al.,
Defendants.

Case No. 1:22-CV-10018 (JSR)

SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

**TO: ALL VICTIMS OF JEFFREY EPSTEIN’S SEX TRAFFICKING VENTURE
DURING THE TIME PERIOD AUGUST 19, 2013 TO AUGUST 10, 2019 (“CLASS”)**

**THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER
SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS
ENTIRETY.**

YOU ARE HEREBY NOTIFIED that a hearing will be held on _____, 2023, at
__:___.m., before the Honorable Jed S. Rakoff at the United States District Court for the Southern
District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New
York, NY, 10007 to determine whether: (1) the proposed settlement (the “Settlement”) of the
above captioned case (“Litigation”) as set forth in the Amended Stipulation of Settlement dated
[X] (“Stipulation”)¹ for \$75,000,000 in cash should be approved by the Court as fair, reasonable,
and adequate; (2) the Judgment as provided under the Stipulation should be entered dismissing the
Litigation with prejudice; (3) to award Boies Schiller Flexner LLP and Edwards Henderson
Lehrman attorneys’ fees, costs, and expenses out of the Settlement Fund and Class Representative
an incentive award out of the Global Settlement Fund (as defined in the Notice of Proposed
Settlement of Class Action (“Notice”), which is discussed below) and, if so, in what amount; and
(4) the Plan of Allocation (as described in the Stipulation and Notice) should be approved by the
Court as fair, reasonable, and adequate. The Court may adjourn or continue the Settlement
Hearing, or hold it via telephone or video conference, without further notice to Class Members.

¹ The Stipulation can be viewed and/or obtained at [X].

You are a “Class Member” if you were abused or trafficked by Jeffrey Epstein and/or his associates during the period between August 19, 2013 and August 10, 2019, including, but not limited to, as set forth below:

- (1) You were a girl under the age of 18 and engaged in sexual contact with Jeffrey E. Epstein and/or a person associated with Epstein, and you received money or something else of value in exchange for engaging in that sexual contact (even if you perceived the sexual contact as consensual);
- (2) You were a woman aged 18 or older, and Epstein and/or a person associated with Epstein forced, coerced, or defrauded you into engaging in sexual contact by, for example, using physical force, threatening serious harm or legal action against you or someone else, making you a false promise, or causing you to believe that not engaging in sexual contact would result in serious harm to you or someone else, and you received money or something else of value in exchange for engaging in that sexual contact; or
- (3) You were a girl or woman of any age and Epstein and/or a person associated with Epstein engaged in sexual contact with you without your consent (even if you perceived the sexual contact as consensual provided you were under the age of 18 at the time of engaging in that contact).

To share in the distribution of the Settlement Fund, you must establish your rights by submitting a Tier One Form by mail or electronically (**no later than _____, 2023**). Your failure to submit a Tier One Form by _____, **2023** will result in a rejection of your claim and preclude you from receiving any recovery in connection with the Settlement of this Litigation. To recover additional proceeds you must also submit a Tier Two Questionnaire and Release by _____, **2023**. To opt-out of the Settlement and preserve your claims related to the Litigation, you must submit an Opt-Out Form by _____, **2023**. If you are a Class Member, you will be bound by the Settlement and any judgment and release entered in the Litigation, including, but not limited to, the Judgment, whether or not you submit a Tier One Form, and/or a Tier Two Questionnaire and Release, unless you submit a timely Opt-Out Form.

If you would like a copy of the Notice, which more completely describes the Settlement and your rights thereunder (including your right to object to the Settlement), or the Settlement Forms described herein, you may obtain these documents, as well as a copy of the Stipulation

(which, among other things, contains definitions for the defined terms used in this Summary Notice) and other Settlement documents, online at [X], or by writing to:

[To Be Determined]
[X] (Claims Administrator Address)
Email: [X] (Claims Administrator email)

Inquiries should NOT be directed to Defendants, Defendants' Counsel, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or for the Settlement Forms, may be made to Lead Counsel:

Brittany Henderson
Bradley Edwards
EDWARDS HENDERSON LEHRMAN
1501 Broadway, Floor 12
New York, New York 10036
Email: EpsteinDBSettlement@epllc.com
Toll-Free Telephone: 800-400-1098

IF YOU DESIRE TO BE EXCLUDED FROM THE CLASS, YOU MUST SUBMIT A REQUEST FOR EXCLUSION (OPT-OUT FORM) SUCH THAT IT IS **RECEIVED BY** _____, **2023**, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE. ALL MEMBERS OF THE CLASS WHO HAVE NOT REQUESTED EXCLUSION FROM THE CLASS WILL BE BOUND BY THE SETTLEMENT EVEN IF THEY DO NOT SUBMIT SETTLEMENT FORMS.

IF YOU ARE A CLASS MEMBER, YOU HAVE THE RIGHT TO OBJECT TO THE SETTLEMENT, THE PLAN OF ALLOCATION, THE REQUEST BY CLASS COUNSEL NOT TO EXCEED THIRTY PERCENT (30%) OF THE SETTLEMENT AMOUNT AND COSTS AND EXPENSES NOT TO EXCEED \$1,500,000.00, PLUS INTEREST EARNED ON BOTH AMOUNTS AT THE SAME RATE AS EARNED BY THE GLOBAL SETTLEMENT FUND. ANY OBJECTIONS MUST BE FILED WITH THE COURT AND RECEIVED BY CLASS COUNSEL AND DEFENDANTS' COUNSEL **BY** _____, **2023** IN THE MANNER AND FORM EXPLAINED IN THE NOTICE.

DATED: _____

BY ORDER OF THE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK